

LATHAM & WATKINS LLP

53rd at Third
885 Third Avenue
New York, New York 10022-4834
Tel: +1.212.906.1200 Fax: +1.212.751.4864
www.lw.com

FIRM / AFFILIATE OFFICES

Barcelona	Moscow
Beijing	Munich
Boston	New Jersey
Brussels	New York
Century City	Orange County
Chicago	Paris
Dubai	Riyadh
Düsseldorf	Rome
Frankfurt	San Diego
Hamburg	San Francisco
Hong Kong	Shanghai
Houston	Silicon Valley
London	Singapore
Los Angeles	Tokyo
Madrid	Washington, D.C.
Milan	

July 20, 2016

VIA ECF & EMAIL

Hon. Katherine Polk Failla
United States District Court
Southern District of New York
40 Foley Square, Courtroom 618
New York, New York 10007

Re: *Israel Gamero, et al. v. Koodo Sushi Corp., et al.*,
1:15-cv-2697 (KPF) (SN) (S.D.N.Y.)

Dear Judge Failla:

Defendants Koodo Sushi Corp. and Michelle Koo (collectively, "Defendants") and Plaintiffs Israel Gamero, Norberto Mastranzo, and Oscar Sanchez (collectively, "Plaintiffs") request a brief extension of the current discovery deadline.

There have been no prior extension requests since discovery was reopened. As the Court is aware, the Court allowed renewed discovery on June 7, 2016, and ordered that discovery "be reopened for a 60-day period, during which Defendants may (i) serve the limited discovery requests appended to their letter motion, and (ii) depose one Plaintiff." Order, ECF No. 46. The Court further ordered that Defendant Koo respond to all previously served interrogatories and documents requests and be made available for a deposition. *Id.*

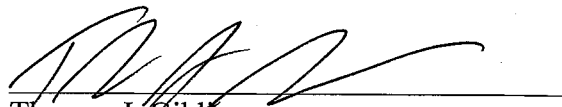
Discovery is scheduled to close on August 8, 2016. The parties have met and conferred several times during the current discovery period, and are working amicably together. However, due to scheduling conflicts and the volume of documents potentially responsive to Plaintiffs' requests for production, the parties have been unable to set a mutually agreeable date for the depositions of Plaintiff Sanchez and Defendant Koo. Therefore, the parties jointly and respectfully request that the Court extend the discovery period through August 19, 2016. We do not believe that this request requires the extension of any other deadlines in this matter. Thank you in advance for your consideration.

Respectfully submitted,


Raquel A. Gutierrez

MICHAEL FAILLACE & ASSOCIATES, P.C.

Counsel for Plaintiffs


Thomas J. Giblin
LATHAM & WATKINS, LLP

Counsel for Defendants

Application GRANTED.

SO ORDERED.

Dated: July 21, 2016
New York, New York

A handwritten signature in blue ink, reading "Katherine Polk Failla". The signature is written in a cursive, flowing style.

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE